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February 7, 2024

VIA ECF

The Hon. Robert B. Kugler
United States District Judge
USDJ, District of New Jersey
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, No. 1:19-md-2875-RBK-KMW (D.N.J.)

Dear Judge Kugler:

I write on behalf of defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; and Solco Healthcare U.S., LLC (collectively, the “ZHP Defendants”), to request an extension of seven (7) days, until February 20, 2024, to submit the ZHP Defendants’ reply in support of their motion to amend and correct the Court’s January 5, 2024 opinion excluding in part several of the parties’ liability experts’ opinions and to respond to plaintiffs’ response and cross-motion regarding same. (See generally ECF Nos. [2581](#), [2591](#), [2626](#).)

Given the pressing nature of trial preparation efforts, as well as the fact that plaintiffs’ filing includes a cross-motion to exclude additional expert testimony, the ZHP Defendants require additional time beyond the seven (7) days contemplated for a reply to prepare a response. The ZHP Defendants have consulted with counsel for plaintiffs, who consent to this request.

Thank you in advance for your consideration.

The Honorable Robert B. Kugler
February 7, 2024
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Respectfully Submitted,



Jessica Davidson

cc: All counsel of record (via ECF)